

Anthony Bartell
abartell@mccarter.com
McCarter & English, LLP
Four Gateway Center
100 Mulberry Street
Newark, New Jersey 07102
(973) 622-4444
Attorneys for Defendant

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

NATIONAL UNION FIRE INSURANCE
COMPANY OF PITTSBURGH, PA,

Plaintiff,

v.

BECTON, DICKINSON AND COMPANY,

Defendant.

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: Case No. 2:14-cv-04318-CCC-MF
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: **NOTICE OF MOTION TO SEAL**
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TO: All Counsel of Record

PLEASE TAKE NOTICE that on June 7, 2021, at 9:00 a.m. or as soon thereafter as counsel may be heard, the undersigned attorneys for defendant Becton, Dickinson and Company (“BD”) shall move before the Honorable Claire C. Cecchi, U.S.D.J., at the United States District Court for the District of New Jersey, Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Newark, New Jersey 07101, for an Order, pursuant to Local Rule 5.3(c), sealing certain highly sensitive and confidential information contained in: (a) plaintiff National Union Fire Insurance Company of Pittsburgh, PA’s (“National Union”) December 2, 2020 summary judgment motion papers (ECF Nos. 255); (b) BD’s February 12, 2021 papers in opposition to National Union’s summary judgment motion (ECF No. 266-283); (c) National Union’s March

26, 2021 reply papers in further support of its summary judgment motion (ECF No. 291); and (d) BD's April 12, 2021 supplemental opposition to National Union's request that this Court refrain from considering certain information contained in BD's initial opposition papers (ECF No. 301).

PLEASE TAKE FURTHER NOTICE that the parties request that the Court unseal Plaintiff's Reply Brief in Support of its motion to exclude (ECF No. 303).

PLEASE TAKE FURTHER NOTICE that in support of its motion, BD shall rely on the Statement of Anthony Bartell, pursuant to Local Rule 7.1(d)(4), and all other pleadings and memoranda on file in this matter.

PLEASE TAKE FURTHER NOTICE that plaintiff consents to the relief requested by this application.

PLEASE TAKE FURTHER NOTICE that BD submits herewith a proposed form of Order.

Dated: May 6, 2021

By: /s/ Anthony Bartell

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CERTIFICATION OF SERVICE

I hereby certify that on May 6, 2021, I caused to be served on all counsel of record, by the United States District Court for the District of New Jersey's electronic filing system (ECF), the following documents: (a) Notice of Motion to Seal; (b) Statement of Anthony Bartell Pursuant to Local Rule 7.1(d)(4) (with accompanying Exhibit); and (c) Proposed Findings of Fact, Conclusions of Law, and Order Granting Motion to Seal.

By: /s/ Anthony Bartell

Anthony Bartell

McCARTER & ENGLISH, LLP